

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**

CITY OF DETROIT, MICHIGAN  
  
DEBTOR.

CASE NO: 13-53846-TJT  
HON. THOMAS J. TUCKER  
Chapter 9

**CERTIFICATION OF NO RESPONSE TO CITY OF DETROIT WATER  
AND SEWERAGE DEPARTMENT'S MOTION FOR ORDER TO SHOW  
CAUSE AGAINST THE ASSOCIATION OF MUNICIPAL ENGINEERS,  
THE ASSOCIATION OF DETROIT ENGINEERS, THE SANITARY  
CHEMISTS AND TECHNICIANS ASSOCIATION AND JOHN RUNYAN  
AND MOTION FOR SANCTIONS AGAINST THE ASSOCIATION OF  
MUNICIPAL ENGINEERS AND JOHN RUNYAN FOR VIOLATION OF  
THE DISCHARGE INJUNCTION**

**NOW COMES** the City of Detroit Water and Sewerage Department,  
by and through counsel, KILPATRICK & ASSOCIATES, P.C., and hereby states  
as follows:

1. On April 19, 2017, Kilpatrick & Associates, P.C., counsel for the  
City of Detroit Water and Sewerage Department, filed its Motion for Order to  
Show Cause Against the Association of Municipal Engineers, The Association of  
Detroit Engineers, the Sanitary Chemists and Technicians Association and John  
Runyan and Motion for Sanctions Against the Association of Municipal Engineers  
and John Runyan for Violation of the Discharge Injunction, Notice of Motion,

Proposed Order, Exhibits, and Proof of service with this Court and an employee of Kilpatrick & Associates, P.C, served copies of the Motion with Exhibits and the Notice of Requirement for Response on the, the Office of the U.S. Trustee, 211 West fort street, Suite 700 Detroit , MI, and by United States Mail Service to:

Association of Municipal Engineers  
Detroit Water & Sewerage Department,  
New Administration Building, Room 420  
9300 West Jefferson  
Detroit, MI 48209  
Att: Partho Ghosh

John Runyan  
Sachs, Waldman, P.C.  
2211 East Jefferson, Suite 200  
Detroit, MI 48207

Sanitary Chemist and Technician Association  
P.O. Box 530353  
Livonia MI 48153  
Attn: Saulius Simoliunas

Association of Detroit Engineers  
P.O. Box 2241  
Detroit, MI 48321  
Attn: Sanjay Patel

2. As of this date, no Objection or Request for Hearing has been filed regarding the Motion as to Association of Municipal Engineers only.

3. More than twenty-one (21) days have passed since the service of said Motion and Notice of Motion.

**WHEREFORE**, Kilpatrick & Associates, P.C., prays this Court grant the Motion for Order to Show Cause Against the Association of Municipal Engineers, and Motion for Sanctions Against the Association of Municipal Engineers for Violation of the Discharge Injunction.

Respectfully submitted;

KILPATRICK & ASSOCIATES, P.C.,

By: /s/Richardo I. Kilpatrick

RICHARDO I. KILPATRICK, ESQ. (P35275)  
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Dated: May 16, 2017

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Case No. 13-53846-TJT  
Hon. Thomas J. Tucker  
Chapter 9

**ORDER GRANTING MOTION FOR ORDER TO SHOW CAUSE  
AGAINST THE ASSOCIATION OF MUNICIPAL ENGINEERS, THE  
ASSOCIATION OF DETROIT ENGINEERS, THE SANITARY CHEMISTS  
AND TECHNICIANS ASSOCIATION AND JOHN RUNYAN AND  
MOTION FOR SANCTIONS AGAINST THE ASSOCIATION OF  
MUNICIPAL ENGINEERS AND JOHN RUNYAN FOR VIOLATION OF  
THE DISCHARGE INJUNCTION**

This matter having come before the Court on the Motion for an Order to Show Cause Against the Association of Municipal Engineers (“AME”), the Association of Detroit Engineers (“ADE”) and the Sanitary Chemists and Technicians Association (“SCATA”) and John Runyan and its Motion for Sanctions Against the Association of Municipal Engineers (“AME”), and John Runyan, due notice having been provided and the Court being otherwise fully advised in the premises;

**IT IS HEREBY ORDERED** that the Motion is granted;

**IT IS FURTHER ORDERED** that the Association of Michigan Engineers shall appear and show cause why they should not be held in contempt.

**IT IS FURTHER ORDERED** that sanctions will be awarded to the Detroit Water and Sewerage Department and against the Association of Michigan Engineers in an amount to be determined by the Court at a hearing to be scheduled after entry of this Order.

**IT IS FURTHER ORDERED** that a Hearing is scheduled for \_\_\_\_\_ at \_\_\_\_\_ .